



## INTEROFFICE CORRESPONDENCE

DATE: January 28, 1994

TO: A. L. Schubert, Waste Programs, Bldg. T130C, X5251

FROM: *[Signature]* C. Broussard, Environmental Operations Management, Bldg. 080, X8517

SUBJECT: REQUEST FOR CHANGES FOR RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)  
UNITS 18.03 AND 18.04 - MCB-031-94

A change to interim status for RCRA Unit 18.03 (Tent 1) and 18.04 (Container storage area near the Decontamination Pad) is required to support environmental restoration activities. Specifically, the requested changes are:

- ( 1 ) Additional waste codes
- ( 2 ) Additional capacity, clarification of waste types, containers, and boundaries
- ( 3 ) Alternative labeling

These actions are part of the action plan developed to meet the Colorado Department of Health schedule for handling of Investigative Derived Material (attach.1). Please provide the request to the Department of Energy by February 18, 1994 in support of this schedule.

- ( 1 ) The following additional waste codes requested for RCRA Unit 18.03 and 18.04 are required to store hazardous waste and Investigative Derived Material (IDM). These additional waste codes have been identified through hazardous waste characterization performed by the hazardous waste generators. The additional waste codes requested for interim status and the Part A Permit are:

Waste Code

D002 (Corrosive)  
D010 (Selenium)  
D018 (Benzene)  
D027 (1,4-Dichlorobenzene)  
D028 (1,2-Dichlorobenzene)  
D029 (1,1-Dichloroethylene)  
D035 (Methyl ethylketone)  
D039 (Tetrachloroethylene)  
D040 (Trichloroethylene)  
D043 (Vinyl Chloride)  
F006  
F007  
F009

**ADMIN RECCRD**

A-OU10-000430

- (2) An interoffice correspondence dated April 15, 1993 requesting, "Changes to the State RCRA Permit Modification for Interim Status Units 18.03 and 18.04" needs to be reviewed. These changes clarified the type of waste being stored at the units. Due to the unit specific conditions for units 18.03 and 18.04, the following information needs to be added to the permit modification and/or interim status to operate the units in compliance.

18.04 - Unit specific conditions include the storage of filter cake equipment containing spent Granular Activated Carbon (GAC) from Operable Unit 2 (OU2) Interim Measures/Interim Remedial Action (IM/IRA), and soil/sediment from the main decontamination facility. Characterized and uncharacterized containers with IDM from environmental restoration activities may also be stored in this unit. In the latest Part A, Revision 14, 18.04 permitted capacity request is 48,235 G or 690Y, this capacity does not include the seventeen 40' cargos which will be placed on the west end of the proposed building for liquid drums. The boundaries need to be extended out to include these cargos. Also, this area needs to be extended out for interim storage arrangement prior to building construction. In the event that physical space becomes an issue due to the size of cargo containers, we would like to store IDM outdoors within the unit boundaries on racks with covers as is done at Unit One or on pallets stacked two high with covers. The capacity must then be changed to reflect the expanded unit to 85,635 G. Although most projects use drums to containerize IDM, it may be extended to other containers such as crates or half crates.

18.03 - Unit specific conditions include soil/sediment from the main decontamination facility, filter cake and equipment containing spent Granular Activated Carbon (GAC) from OU2 IM/IRA may be stored here. Characterized and uncharacterized containers with IDM from environmental restoration activities may also be stored in this unit. In the latest Part A, Revision 14, 18.03 permitted capacity request is 82,940 G or 1,242 Y, this capacity fulfills the needs for permitted storage, the interim status capacity is 145,200 G or 660 Y, this needs to be changed to the same capacity as permitted capacity. A review of previous correspondence has revealed that the specific boundaries of interim status Unit 18.03 have not been clearly defined. The interim and when permitted area needs to include 20' and 40' cargo containers. In the event that physical space becomes an issue due to the size of the tent, we would like to store IDM outdoors within the unit boundaries on racks with covers as is done at Unit One or on pallets stacked two high with covers. Although most projects use drums to containerize IDM, it may be extended to other containers such as crates or half crates.

- (3) Containers with IDM from environmental restoration activities labeled as "Environmental Material Pending Assessment" may be stored in this unit.

In anticipation of required additional storage space an interoffice correspondence dated September 23, 1993, "Additional Permitted Storage for Investigative Derived Material" documents the permitting request of Buildings 223 and 553. The procurement of these two buildings would give Environmental Restoration the use of storage for 288-55 gallon drums in Building 553 and

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504-55 gallon drums in Building 223. There is also enough space surrounding Building 223 to allow for ten 40' cargo containers for an additional 400 drums. We also need to clarify what types of waste that may be stored there. Unit specific conditions include filter cake and equipment containing spent GAC from OU2 IM/IRA may be stored here. Characterized and uncharacterized containers with IDM from environmental restoration activities may also be stored in these units. Buildings 223 and 553 require the same Environmental Protection Agency (EPA) codes requested for 18.03 and 18.04.

In summary, the current number of IDM drums under RCRA management is 3, 677, many of these drums will be deemed non-hazardous and escape the RCRA management loop once the contained-in risk assessment has been completed. The projected cumulative drums in storage at the end of 1997 is 4,000 from corrective action activities associated with the Interagency Agreement (IAG), and 2,000 other projects. There may also be other construction projects within RCRA Unit 18.03 Individual Hazardous Substance Sites which generates IDM. OU2 IM/IRA facility has improved operations and reduced the number of drums and GACs produced by fifty percent. They will be generating 3 GACs and ninety 55 gallon drums per year. Also, the withdrawal of the Remedial Action Decontamination Pad from interim status eliminates the 288 projected drums generated per year. The proposed changes will give Environmental Operations Management enough storage capacity for 8,286 55-gallon drums which shall cover anticipated and unexpected waste generated from corrective action activities associated with the IAG and excavation activities.

SLM:lmw

cc:  
J. D. Roberts  
ERM Records Center